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### ED STATES DISTRICT COURT

# ERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO/OAKLAND DIVISION

LETICIA ZAMORA and	DANIEL	<b>PEREZ</b>	and
ELIZABETH PEREZ,			

Plaintiffs,

VS.

WORLD SAVINGS BANK FSB,

Defendant.

No.: C 07 4603 JSW

### **CLASS ACTION**

JOINT STATUS REPORT ON PROGRESS OF DEVELOPMENT OF E-DISCOVERY PROTOCOL AND DOCUMENT DISCOVERY PLAN

Pursuant to the Court's Minute Order of February 4, 2008 and its subsequent Order of March 10, 2008, counsel for Plaintiffs Leticia Zamora and Daniel and Elizabeth Perez ("Plaintiffs") provided counsel for Defendant World Savings Bank, FSB ("World") with a comprehensive proposed Electronic Discovery Protocol on February 29, 2008, and counsel then met and conferred on March 14, 2008 concerning the proposal. Counsel have not yet reached agreement on a full set of protocols for electronic discovery in this action, but have narrowed considerably several of the more

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significant issues and have reached tentative consensus on some of the other broad parameters of the expected process, subject to: (1) further investigation of applicability to the actual information and systems to be involved in this action; (2) client approvals; and (3) appropriate documentation. World expects to be able to report to plaintiffs within approximately one week on projected timing for delivery of certain information regarding World's basic information systems to plaintiffs, following which counsel for both parties will engage in further meet and confer sessions concerning commencement of the document identification and recovery process.

DATED: March 17, 2008.

#### REED SMITH LLP

 $By_{\underline{\phantom{a}}}$ /s/Jack R. Nelson Tyree P. Jones, Jr. Heather B. Hoesterey Attorneys for Defendant World Savings Bank, FSB

DATED: March 17, 2008.

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